

ENTERED

August 23, 2023

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FREE SPEECH SYSTEMS LLC §

**Case No. 22-60043
(Chapter 11)**

**AGREED ORDER GRANTING RELIEF FROM AUTOMATIC STAY
(This Order Resolves Docket # 677)**

Ally Bank (“Movant”) filed a motion for relief from the automatic stay [and co-debtor stay] against 2020 Chevrolet Tahoe Utility 4D LT 4WD 5.3L V8, VIN # 1GNSKBKCXLR288493 (the “Property”). Movant represented to the Court that it had served the motion in accordance with all applicable rules and provided notice of the hearing. As shown by Debtor(s)’ or Debtor(s)’ counsel signature below, Debtor(s) have agreed to the requested relief. If there is a co-debtor, the co-debtor failed to file a timely objection to the proposed relief.

Accordingly, it is ordered that Movant is granted leave from the automatic stay to pursue its state law remedies against the Property, including repossession, foreclosure and/or eviction.

The stay imposed by Bankruptcy Rule 4001(a)(3) does not apply.

Signed: August 23, 2023


Christopher Lopez
United States Bankruptcy Judge

Form O-200

Agreed:

AGREED AND ENTRY REQUESTED:

/s/ Ray Battaglia

Signature-Debtor(s)' counsel (or debtor, if pro se)

Name: Raymond W. Battaglia

State Bar No.: 019108055

Address: 66 Granburg Circle, San Antonio, TX 78218

Telephone: 210 601-9405

Fax: _____

E-mail: rbattaglia@outlook.com

/s/ Patrick M. Lynch

Signature-Movant's counsel

Name: Patrick M. Lynch

State Bar No.:#24065655

S.D. Tex. Bar No.: _____

Address: 2001 Bryan St., Suite 1800, Dallas,
TX 75201

Telephone: (214) 880-1864

Fax: (214) 871-2111

E-mail: plynch@qslwm.com

[Document must be signed by Debtor(s) or by Debtor(s)' counsel or both. Electronic signatures may be submitted. Movant must retain copies of the original signatures.]

By submitting this Agreed Order, Movant 's counsel certifies that counsel reviewed the docket sheet after the expiration of the deadline for responses and that no co-debtor has filed any opposition to the requested relief.

United States Bankruptcy Court
Southern District of Texas

In re:
Free Speech Systems LLC
Official Committee of Unsecured Creditor
Debtors

Case No. 22-60043-cml
Chapter 11

District/off: 0541-4
Date Rcvd: Aug 23, 2023

User: ADIuser
Form ID: pdf002

Page 1 of 2
Total Noticed: 21

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
^	Addresses marked '^' were sent via mandatory electronic bankruptcy noticing pursuant to Fed. R. Bank. P. 9036.
#	Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update. While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 25, 2023:

Recip ID	Recipient Name and Address
db	+ Free Speech Systems LLC, 3019 Alvin Devane Blvd. STE 300, Austin, TX 78741-7417
aty	Kyung Shik Lee, Shannon & Lee LLP, Pennzoil Place-Suite 1300, HOUSTON, TX 77027, UNITED STATES
aty	+ Richard A. Cochran, Caldwell Cassady Curry PC, 2121 N. Pearl St., Ste. 1200, Dallas, TX 75201-2494
aty	+ Shannon & Lee LLP, 700 Milam Street, STE 1300, Houston, TX 77002-2736
intp	+ Alex E Jones, c/o Jordan & Ortiz PC, 500 N Shoreline Blvd, Ste 900, Corpus Christi, TX 78401-0658
cr	+ Ally Bank, c/o Quilling, Selander, et al, 2001 Bryan Street, Suite 1800, Dallas, TX 75201-3070
cr	+ David Wheeler, et al., c/o Cain & Skarnulis PLLC, 303 Colorado Street, Suite 2850, Austin, TX 78701-0137
cr	+ Elevated Solutions Group, LLC, c/o Walker & Patterson, P.C., P.O. Box 61301, Houston, TX 77208-1301
cr	#+ Leonard Pozner, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774
cr	#+ Marcel Fontaine, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin, Suite 2700 Houston, TX 77002-6774
cr	#+ Neil Heslin, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774
cr	+ Reeves Law, PLLC, 702 Rio Grande St., Ste. 203, Austin, TX 78701-2720
cr	+ Richard M. Coan, c/o Cain & Skarnulis PLLC, 303 Colorado Street, Suite 2850, Austin, TX 78701-0137
cr	#+ Scarlett Lewis, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774
cr	+ Security Bank of Crawford, P.O. BOx 90, Crawford, Tx 76638-0090
cr	#+ Veronique De La Rosa, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774

TOTAL: 16

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
cr	+ Email/PDF: acg.acg.ebn@aisinfo.com	Aug 24 2023 12:00:06	Ally Bank, c/o AIS Portfolio Services, LLC, 4515 N Santa Fe Ave. Dept. APS, Oklahoma City, OK 73118-7901
crcm	+ Email/Text: mbrimmage@akingump.com	Aug 24 2023 11:46:00	Official Committee of Unsecured Creditors of Alexa, c/o Marty L. Brimmage, Jr., Akin Gump Strauss Hauer & Feld LLP, 2300 N. Field Street, Suite 1800, Dallas, TX 75201-4675
cr	+ Email/Text: lemaster@slollp.com	Aug 24 2023 11:46:00	PQPR Holdings Limited, LLC, c/o Streusand Landon Ozburn & Lemmon LLP, attn: Stephen Lemmon, 1801 S. Mopac Expressway, Suite 320, Austin, TX 78746-9817
cr	^ MEBN	Aug 24 2023 11:47:37	Texas Comptroller of Public Accounts, Revenue Acco, Christopher J. Dylla, P.O. Box 12548, Austin, TX 78711-2548
cr	+ Email/Text: BKECF@traviscountyt.gov	Aug 24 2023 11:46:00	Travis County, c/o Jason A. Starks, P.O. Box 1748, Austin, TX 78767-1748

TOTAL: 5

District/off: 0541-4

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BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
aty		Akin Gump Strauss Hauer & Feld LLP
cr		ADP TotalSource, Inc.
wit		Charles "Charlie" Cicack
res		Cicack Holdings, LLC
intp		David Ross Jones
op		Marc Schwartz
op		Marc Schwartz
op		Schwartz Associates, LLC
op		Schwartz and Associates, LLC
intp		Shelby A Jordan
intp		Sweetwater Holdings Group, Inc.
op		W. Marc Schwartz

TOTAL: 12 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 25, 2023

Signature: /s/Gustava Winters